

TECHNICAL BASIS FOR TIER I OPERATING PERMIT

DATE: December 3, 2002

PERMIT WRITER: Almer Casile

PERMIT COORDINATOR: Bill Rogers

SUBJECT: AIRS Facility No. 075-00001, Woodgrain Millwork, Inc., Fruitland
Final Tier I Operating Permit

Permittee:	Woodgrain Millwork, Inc.
Permit Number:	075-00001
Air Quality Control Region:	063
AIRS Facility Classification:	A
Standard Industrial Classification:	2431
Zone:	11
UTM Coordinates:	506.8 , 4883.9
Facility Mailing Address:	300 NW 16th St., Fruitland, ID 83619
County:	Payette
Facility Contact Name and Title:	David Lindsey, Vice President
Contact Name Phone Number:	(208) 452-3801, ext. 264
Responsible Official Name and Title:	Reed Dame, President & CEO
Exact Plant Location:	Northeast ¼, Section 22, T8N, R5W, Boise-Meridian
General Nature of Business & Kinds of Products:	Prefinished moldings and millwork

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutant(s)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
MACT	Maximum Available Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter equal to or less than a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PW	process weight
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound(s)

PUBLIC COMMENT / AFFECTED STATES / EPA REVIEW SUMMARY

A 30-day public comment period for the Woodgrain Millwork, Inc. draft Tier I operating permit was held from August 8 to September 12, 2003 in accordance with IDAPA 58.01.01.364, *Rules for the Control of Air Pollution in Idaho*. A public hearing was held September 11, 2002. Comment provided during the public comment period and public hearing, as well as the DEQ's responses, are presented as Appendix A of this document.

IDAPA 58.01.01.008.01, defines *affected states* as: "*All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within fifty (50) miles of the Tier I source.*"

A review of the site location information included in the permit application indicates that the facility is located within 50 miles of a state border. Therefore, the state of Oregon was provided an opportunity to comment on the draft Tier I operating permit.

A proposed permit was developed based on comments submitted during the public comment period. The proposed permit was then forwarded to EPA for their review as required by IDAPA 58.01.01.366. The EPA provided no written objection to the permit.

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The DEQ has reviewed the information provided by Woodgrain Millwork regarding the operation of their Fruitland facility. This information was submitted based on the requirements to submit a Tier I operating permit in accordance with IDAPA 58.01.01.300.

2. SUMMARY OF EVENTS

June 27, 1995	DEQ received the Tier I operating permit application from Woodgrain Millwork for their Fruitland facility.
July 31, 1998	DEQ requested an update to the application on July 31, 1998.
September 11, 1998	DEQ acknowledged receipt of the update.
October 30, 1998	DEQ deemed the application complete on October 30, 1998.
February 2, 2000	DEQ deemed the application incomplete, and determined that further information was to be submitted.
February 17, 2000	DEQ received the requested materials.

3. BASIS OF THE ANALYSIS

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- Tier I operating permit application, received June 27, 1995 and supplemental application materials received on September 4, 1998 and February 17, 2000.
- Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, January 1995, Office of Air Quality Planning and Standards, United States Environmental Protection Agency.
- Guidance developed by the EPA and DEQ.
- Title V permits issued by other jurisdictions.

4. FACILITY DESCRIPTION

4.1 General Process Description

Woodgrain Millwork mills and finishes wood door components, moldings, and window parts. The process involves ripping, cross-cutting, finger-jointing, and hogging dimensional lumber. A bagging operation handles wood shavings generated as a byproduct of the process. Various coatings, including both water and solvent-based paints, are applied to the component parts for the wood molding, and window and door assemblies, and adhesives are applied for the finger-jointing process.

4.2 Facility Classification

The facility is classified as a major facility, in accordance with IDAPA 58.01.01.008.10, for Tier I permitting purposes because the facility emits or has the potential to emit the following:

- VOC at 481.8 T/yr
- HAP at 25 T/yr (or more of any combination of HAPs)

The facility is also major as defined in IDAPA 58.01.01.006.55 and is currently subject to PSD permitting requirements because the facility emits or has the potential to emit a regulated air pollutant in amount greater than or equal to 250 T/yr. The facility is not a designated facility as defined in IDAPA 58.01.01.006.27. The AIRS/AFS facility classification is A. The SIC code defining the facility is 2431.

4.3 Area Classification

The facility is located in Payette County, which is located within AQCR 63. This area is unclassifiable for all federal and state criteria pollutants. There are no Class I areas within 10 km of the facility.

4.4 Permitting History

August 6, 1992	PTC No. 075-00001, Millwork products
November 24, 1993	PTC No. 075-00001, Prefinished molding and millwork
July 7, 1995	PTC No. 075-00001, PTC modification
October 2, 1995	PTC No. 075-00001, PTC modification - Exemption request
April 24, 1996	PTC No. 075-00001, PTC Amendment
September 5, 1996	PTC No. 075-00001, PTC Amendment
September 20, 1996	PTC No. 075-00001, PTC Modification
February 20, 1998	PTC No. 075-00001, Dimensional lumber / Wood shavings bagging operation
January 22, 1999	PTC No. 075-00001, PTC Modification
May 28, 2002	PTC No. 075-00001, PTC Modification

4.5 Emissions Description

The facility is major for VOC and HAP emissions. The facility also emits PM and PM₁₀ in non-major amounts. Particulate matter emissions are generated by ripping, crosscutting, finger jointing, hogging dimensional lumber, and bagging wood shavings.

5. REGULATORY ANALYSIS

5.1 Facility-wide Applicable Requirements

5.1.1 Fugitive Particulate Matter - IDAPA 58.01.01.650-651

5.1.1.1 Requirement

Permit Condition 2.1 states that all reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650 through 651.

5.1.1.2 Compliance Demonstration

Permit Condition 2.2 states that the permittee is required to monitor and maintain records of the frequency and the methods used by the facility to reasonably control fugitive particulate emissions. IDAPA 58.01.01.651 gives some examples of ways to reasonably control fugitive emissions (e.g., using water or chemicals, applying dust suppressants, using control equipment, covering trucks, paving roads or parking areas, and removing materials from streets).

Permit Condition 2.3 requires that the permittee maintain a record of all fugitive dust complaints received. In addition, the permittee is required to take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The permittee is also required to maintain records that include the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

To ensure that the methods being used by the permittee to reasonably control fugitive PM emissions whether or not a complaint is received, Permit Condition 2.4 requires that the permittee conduct periodic inspections of the facility. The permittee is required to inspect potential sources of fugitive emissions during daylight hours and under normal operating conditions. If the permittee determines that the fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee is also required to maintain records of the results of each fugitive emissions inspection.

Permit Conditions 2.3 and 2.4 require the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid complaint or determining that fugitive particulate emissions are not being reasonably controlled meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.2 Control of Odors - IDAPA 58.01.01.775 -776

5.1.2.1 Requirement

Permit Condition 2.5 and IDAPA 58.01.01.776 both state: *"No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids to the atmosphere in such quantities as to cause air pollution."* This condition is currently considered federally enforceable until such time it is removed from the SIP, at which time it will be a state-only enforceable requirement.

5.1.2.2 Compliance Demonstration

Permit Condition 2.6 requires the permittee to maintain records of all odor complaints received. If the complaint has merit, the permittee is required to take appropriate corrective action as expeditiously as practicable. The records are required to contain the date that each complaint was

received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Permit Condition 2.6 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid odor complaint meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.3 Visible Emissions - IDAPA 58.01.01.625

5.1.3.1 Requirement

IDAPA 58.01.01.625 and Permit Condition 2.7 state *"No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than twenty percent (20%) opacity as determined . . ."* by IDAPA 58.01.01.625. This provision does not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emissions to comply with the requirements of this rule.

5.1.3.2 Compliance Demonstration

To ensure reasonable compliance with the visible emissions rule, Permit Condition 2.8 requires that the permittee conduct routine visible emissions inspections of the facility. The permittee is required to inspect potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection consists of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emissions covered by this section, the permittee must either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is determined to be greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee must take corrective action and report the exceedance in its annual compliance certification and in accordance with the excess emissions rules in IDAPA 58.01.01.130 through 136. The permittee is also required to maintain records of the results of each visible emissions inspection and each opacity test when conducted. These records must include the date of each inspection, a description of the permittee's assessment of the conditions existing at the time visible emissions are present, any corrective action taken in response to the visible emissions, and the date corrective action was taken.

It should be noted that if a specific emissions unit has a specific compliance demonstration method for visible emissions that differs from Permit Condition 2.8, then the specific compliance demonstration method overrides the requirement of Permit Condition 2.8. Permit Condition 2.8 is intended for small sources that would generally not have any visible emissions.

Permit Condition 2.8 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of discovering visible emissions meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.4 Excess Emissions

5.1.4.1 Requirement

Permit Condition 2.9 requires that the permittee comply with the requirements of IDAPA 58.01.01.130 through 136 for startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns. This section is fairly self-explanatory and no additional detail is necessary in this technical analysis. It should however, be noted that Subsections 133.02, 133.03, 134.04, and 134.05 are not specifically included in the permit as applicable requirements. These provisions of the *Rules* only apply if the permittee anticipates requesting consideration under Subsection 131.02 of the *Rules* to allow DEQ to determine if an enforcement action to impose penalties is warranted. Section 131.01 states ". . . The owner or operator of a facility or emissions unit generating excess emissions shall comply with Sections 131, 132, 133.01, 134.01, 134.02, 134.03, 135, and 136, as applicable. If the owner or operator anticipates requesting consideration under Subsection 131.02, then the owner or operator shall also comply with the applicable provisions of Subsections 133.02, 133.03, 134.04, and 134.05." Failure to prepare or file procedures pursuant to Sections 133.02 and 134.04 is not a violation of the *Rules* in and of itself, as stated in Subsections 133.03.a and 134.06.b. Therefore, since the permittee has the option to follow the procedures in Subsections 133.02, 133.03, 134.04, and 134.05; and is not compelled to, the subsections are not considered applicable requirements for the purpose of this permit and are not included as such.

5.1.4.2 Compliance Demonstration

The compliance demonstration is contained within the text of Permit Condition 2.9. No further clarification is necessary here.

5.1.5 Open Burning

All open burning shall be done in accordance with IDAPA 58.01.01.600 through 616.

5.1.6 Renovation/Demolition - 40 CFR 61, Subpart M (Asbestos)

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

5.1.7 Chemical Accident Prevention Provisions - 40 CFR 68

Any facility that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

5.1.8 Test Methods

The test method(s) for each emissions unit limit is listed in the permit in accordance with the EPA's comments as follow below. If the permit requires any testing, it shall be conducted in accordance with the procedures in IDAPA 58.01.01.157.

5.1.9 Reports and Certifications

All periodic reports and certifications required by the permit shall be submitted within 30 days of the end of each specified reporting period to the appropriate DEQ and the EPA regional office.

5.1.10 Monitoring and Recordkeeping

The permittee is required to maintain recorded data in an appropriate location for a period of at least five years in accordance with IDAPA 58.01.01.322.07.c. Though specific applicable requirements may have record retention times of less than five years, this requirement requires the permittee to maintain all recorded data for a minimum of five years, which will satisfy those shorter record retention times.

5.1.11 Fuel-burning Equipment

The permittee is required to comply with grain-loading standards per IDAPA 58.01.01.676 through 677. No monitoring, recordkeeping, and reporting requirements for fuel-burning equipment have been included in the permit pertaining to the grain-loading standard. Proper combustion of natural gas assures compliance with this requirement.

5.1.12 Fuel-sulfur Content

IDAPA 58.01.01.725 through 728 has been established to prevent excessive ground-level concentrations of SO₂ from fuel burning sources. This requirement is a generally applicable requirement that applies to all facilities. The permittee is prohibited from selling, distributing, using or making available for use, any residual fuel oil containing more sulfur by weight than given in IDAPA 58.01.01.725 through 728. No monitoring or recordkeeping is required. A review of permits issued to the facility revealed that it currently does not accept residual oil.

5.1.13 Recycling and Emission Reductions - 40 CFR 82, Subpart F

The purpose of 40 CFR 82, Subpart F, is to reduce emissions of Class I and Class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with Section 608 of the Clean Air Act. Subpart F applies to any person servicing, maintaining, or repairing appliances except for motor vehicle emissions. Subpart F also applies to persons disposing of appliances, including motor vehicle air conditioners.

5.1.14 Air Pollution Emergency Rule

IDAPA 58.01.01.550 through 562 is a generally applicable requirement that applies to this facility. The purpose of Sections 550 through 562 is to define criteria for an air pollution emergency, to formulate a plan for preventing or alleviating such an emergency, and to specify rules for carrying out the plan.

5.2 NSPS - 40 CFR 60

A review of submitted Tier I operating permit application materials and inspection reports revealed that no subparts of 40 CFR 60 apply to this facility.

5.3 NESHAPS - 40 CFR 61 and 63

The permittee is an affected facility subject to the requirements of 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry. Subpart KK requires existing

and new major sources to control HAP emissions using MACT. Specifically, Subpart KK limits emissions for publication rotogravure, product and packaging rotogravure, and wide-web printing. The permittee's printing process is subject to the requirements of Subpart KK.

6. REGULATORY ANALYSIS - EMISSIONS UNITS

6.1 DIMENSIONAL LUMBER

6.1.1 Emissions Unit Description

See the summary description of Section 3 of the operating permit.

6.1.2 Permit Requirement - PM Emissions

Pound per hour, and tons per year PM emissions limits are applicable requirements established by PTC No. 075-00001, dated May 28, 2002.

6.1.3 Compliance Demonstration

The permittee is required to vent particulate emissions to a baghouse, and develop a manual for its operation and maintenance (O&M manual). Permit Conditions 3.6 and 3.7 reasonably assure that PM emissions are controlled. The sawdust and chip throughput and pressure drop monitoring and recordkeeping requirements of Permit Conditions 3.11.1 and 3.11.3 provide data that can be used to demonstrate compliance with the particulate emissions limits.

Compliance shall be determined using the estimation methods used in the permit application analysis of PTC No. 075-00001, dated February 20, 1998.

All data required by these permit conditions shall be certified by the responsible official.

6.1.4 Permit Requirement - PM₁₀ Emissions

Pound per hour and ton per year PM₁₀ emissions are applicable requirements established by PTC No. 075-00001, dated May 28, 2002.

6.1.5 Compliance Demonstration

Compliance procedures for PM₁₀ are the same as those for PM. Please see Section 6.1.3 of this memo.

6.1.6 Permit Requirement - VOC Emissions

The annual VOC emissions limit of Permit Condition 3.3 is established by PTC No. 075-00001, May 28, 2002.

6.1.7 Compliance Demonstration

Operating requirements limiting adhesive usage serve as surrogate emissions limits for the annual VOC emissions limits. The permittee is required to monitor and record adhesive usage for the most recent 12-month period (gal/yr), including the amount of each type of adhesive used. This data is then used to determine compliance with the adhesive usage limits given in Permit Conditions 3.8.1 and 3.8.2.

6.1.8 Permit Requirement - Visible Emissions

The visible emissions limit of Permit Condition 3.4 is taken from PTC No. 075-00001, dated February 20, 1998, which has been incorporated into the facility's May 28, 2002 permit. It is also a facility-wide condition, Permit Condition 2.7, that has been listed as an applicable requirement for this emissions unit.

6.1.9 Compliance Demonstration

The permittee shall demonstrate compliance with the visible emissions standard by conducting a monthly visible emissions inspection, as stated in Permit Condition 2.8 and referenced by Permit Condition 3.12.

6.1.10 Permit Requirement - Fugitive Emissions

The fugitive emissions limit of Permit Condition 3.5 is taken from PTC No. 075-00001, dated February 20, 1998. It is also a facility-wide condition, Permit Condition 2.1, that has been listed as an applicable requirement for this emissions unit.

6.1.11 Compliance Demonstration

As referenced by Permit Condition 3.11, and given in Permit Conditions 2.2, 2.3, and 2.4, the permittee shall monitor and maintain records of:

- The frequency and the method(s) used to reasonably control fugitive emissions,
- All fugitive dust complaints received, and
- The results of each quarterly fugitive emissions inspection to demonstrate compliance with Permit Condition 3.4.

Quarterly fugitive dust inspections shall be conducted as required by Permit Condition 3.11 and 2.4.

6.1.12 Permit Requirement – Process Weight PM Emissions Limitations

The PW PM emissions limitations apply to the source per IDAPA 58.01.01.701.

6.1.13 Compliance Demonstration

Demonstration of compliance with IDAPA 58.01.01.701 is reasonably assured by venting emissions through a baghouse. The permit requires weekly pressure drop monitoring and recordkeeping to assure the baghouse is operated as designed.

6.2 WOOD SHAVINGS BAGGING OPERATION

6.2.1 Emissions Unit Description

See the summary description of Section 4 of the operating permit.

6.2.2 Permit Requirement - Visible Emissions

The visible emissions limit of Permit Condition 4.1 is taken from PTC No. 075-00001, dated May 28, 2002. It is also a facility-wide condition, Permit Condition 2.7, that has been listed as an applicable requirement for this emissions unit because it has the potential to generate visible emissions.

6.2.3 Compliance Demonstration

The permittee shall demonstrate compliance with the visible emissions standard by conducting a quarterly visible emissions inspection, as stated in Permit Condition 2.8 and referenced by Permit Condition 4.8.

6.2.4 Permit Requirement - Fugitive Emissions

The fugitive emissions limit of Permit Condition 4.2 is taken from PTC No. 075-00001, dated May 28, 2002. It is also a facility-wide condition, Permit Condition 2.1, that has been listed as an applicable requirement for this emissions unit because this process has the PTE fugitive dust.

6.2.5 Compliance Demonstration

As referenced by Permit Condition 4.9 and given in Permit Conditions 2.2, 2.3, and 2.4, the permittee shall monitor and maintain records of:

- The frequency and the method(s) used to reasonably control fugitive emissions,
- All fugitive dust complaints received, and
- The results of each quarterly fugitive emissions inspection to demonstrate compliance with Permit Condition 4.9.

Quarterly fugitive dust inspections shall be conducted as required by Permit Condition 2.4.

6.2.6 Permit Requirement - PM Emissions

Pound-per-hour, and ton-per-year PM emissions are applicable requirements established by PTC No. 075-00001, dated May 28, 2002.

6.2.7 Compliance Demonstration

The permittee is required to develop an O&M manual for the baghouse. These requirements, given in Permit Conditions 3.10 and 4.5, assure that PM emissions are controlled. The wood shavings throughput, days of operation, monthly average daily production rate, and pressure drop monitoring and recordkeeping requirements of Permit Condition 4.7 provide data that can be used to demonstrate compliance with the particulate emissions limits. A review of the original emissions estimate was performed, and it was determined that the baghouse efficiency has been guaranteed at 99.999%. Compliance shall be determined as follows:

$$E = \text{Throughput} \times (1 - (99.999/100))$$

Where:

E	=	Emissions Rate, lb/hr or T/yr (dependent upon throughput)
Throughput	=	monthly average production rate in lb/hr or annual production in T/yr

The responsible official shall certify all data required by these permit conditions.

6.2.8 Permit Requirement - PM₁₀

Pound per hour and ton per year PM₁₀ emissions are applicable requirements established by PTC No. 075-00001, dated May 28, 2002.

6.2.9 Compliance Determination

Compliance procedures for PM₁₀ are the same as those for PM. Please see Section 6.2.7 of this memo.

6.2.10 Permit Requirement – PW PM Emissions Limitations

The PW PM emissions limitations apply the source per IDAPA 58.01.01.701.

6.2.11 Compliance Demonstration

See section 6.1.13 of this memorandum.

6.3 MILLWORK COATING (PREFINISH) PROCESS

6.3.1 Emissions Unit Description

This process involves applying various coating onto component parts for wood molding, and window and door assemblies. The coatings include both water and solvent-based paints. Seven process units are part of this process, one is temporary. Please note that the May 28, 2002 permits state that the following modifications are covered:

- Process unit 1 - Install two new solvent-based flow coater lines.
- Process unit 2 - Install new water-based millwork prime lines.
- Process unit 3 - Install new water-based paper painter and printer.
- Process unit 4 - Install new specialty lines.
- Process unit 5 and 6 - Convert solvent-based basecoat flow coaters to water-based basecoat flow coaters.
- Process unit 7 - Install new coating lines, not to exceed one year in duration.

A review of inspection reports has revealed that the permittee has performed all the installations except those for Process Unit 7.

6.3.2 Permit Requirement - Visible Emissions

The visible emissions limit of Permit Condition 5.1 is taken from PTC No. 075-00001, dated May 28, 2002. It is also a facility-wide condition, Permit Condition 2.7, that has been listed as an applicable requirement for this emissions unit because it has the potential to generate visible emissions.

6.3.3 Compliance Demonstration

The permittee shall demonstrate compliance with the visible emissions standard by conducting a quarterly visible emissions inspection, as stated in Permit Condition 2.8 and referenced by Permit Condition 5.8.

6.3.4 Permit Requirement - VOC Emissions (before and after implementation)

The pound-per-hour and ton-per-year VOC emissions limits for the Prefinish Process are an applicable requirement taken from PTCs No. 075-00001, dated January 22, 1999 and May 28, 2002, which has been referenced in the facility's May 28, 2002 permit. These limits are given in Permit Condition 5.2. The limits in Permit Condition 5.2 apply before and after implementation of Process Unit 7 and after the 9% increase in coatings for this process. The limits of Permit Condition 5.3 are also taken from PTCs No. 075-00001, dated January 22, 1999 and May 28, 2002. The limits of Permit Condition 5.3 apply to wood coating VOC emissions during implementation of Process Unit 7 (duration shall be less than one year) from the Prefinish Process. The emissions limits have been established so that the modification associated with PTC resulted in a net decrease in emissions.

6.3.5 Compliance Demonstration

Usage values for VOCs established as operating requirements in Permit Condition 5.5 and 5.6 serve as surrogates to the VOC emissions limits of Permit Conditions 5.2 and 5.3. The usage limits of Permit Condition 5.5 and 5.6 mirror Permit Conditions 5.2 and 5.3. Permit Conditions 5.2 and 5.3 specify when they applied. Permit Condition 5.5 defines the procedure for determining VOC usage and waste stream VOCs. This procedure is also used for determining VOC usage and waste stream VOCs for Permit Condition 5.6. The equation given in Permit Condition 5.5 and the procedures set forth in Permit Condition 5.11.1 are used to determine the monthly average ton-per-hour usage rate, and the monthly average ton-per-hour waste stream generation rate. The values from these calculations are then used to determine compliance with the monthly limits of Permit Condition 5.5. Permit Condition 5.11 also requires the permittee to record the calculated values. Permit Condition 5.20 provides the notice cited in Permit Condition 5.6.

6.3.6 Permit Requirement - HAP Emissions, 40 CFR 63.825(b).

The permittee is an affected facility per 40 CFR 63.820(a)(1). Therefore, the emissions standards of 40 CFR 63.825(b) are included in the permit as an applicable requirement under Permit Condition 5.4.

6.3.7 Compliance Demonstration

The compliance demonstration procedures are set forth in 40 CFR 63, Subpart KK and are referenced in the permit. The monitoring and recordkeeping requirements necessary to demonstrate compliance with Permit Condition 5.4 are given in Permit Conditions 5.11 through 5.27. Permit conditions 5.1 through 5.26 reference the applicable requirements of 40 CFR 63, Subpart KK. Per Permit Conditions 5.25 and 5.26, the permittee shall also comply with the reporting requirements of 40 CFR 63.830(a) and 40 CFR 63.830(b)(1) through (6).

7. INSIGNIFICANT ACTIVITIES

Listed below are the insignificant activities described by the source in accordance with IDAPA 58.01.01.317(b)(i)

Table 7.1 - INSIGNIFICANT ACTIVITIES

Description	Insignificant activities section citation IDAPA 58.01.01.17.01.b.i
Welding	IDAPA 58.01.01.17.01.b.i.(9)
Storage and handling of water-based lubricants for metal working	IDAPA 58.01.01.17.01.b.i.(27)

8. ALTERNATIVE OPERATING SCENARIOS

No alternative operating scenario has been submitted by the permittee.

9. TRADING SCENARIOS

No trading scenarios have been submitted by the permittee.

10. COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

Pursuant to the information submitted by Woodgrain Millwork in the June 27, 1995 Tier I operating permit (Tier I) application and as confirmed by an June 20, 2001 air quality inspection, Woodgrain Millwork has not obtained permits to construct (PTCs) for construction and/or modification of all emission sources at the facility in accordance with IDAPA 58.01.01.200 through 223. The sources listed in Table 10.1 were specifically identified as sources that were required to, but did not obtain, a PTC.

For any source not listed in Table 10.1 that may have needed a PTC, the permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

Because these sources have been constructed and/or modified without a permit, the Department has determined that the most appropriate course of action to bring the facility into compliance with the requirements is to issue a single facility-wide permit that:

- (a) specifically establishes the operating terms and conditions required by the PTC rules for sources for which a permit was required but not obtained; and
- (b) collectively addresses the operating terms and conditions required to demonstrate that emissions from all sources at the facility will not contribute to the violation of an applicable standard.

The Department is, therefore, requiring a combined Tier II operating permit (Tier II) and PTC (hereafter referred to as the facility-wide permit). The Tier II for Woodgrain Millwork is required in accordance with IDAPA 58.01.01.401.03 based on the determination that specific emission standards, or requirements on operation or maintenance are necessary to ensure compliance with any applicable emission standard or rule. The facility-wide permit will contain the terms and conditions necessary for the facility to comply with the applicable requirements of IDAPA 58.01.01.400 through 410.

The facility-wide permit will also include all of the terms and conditions for new or modified sources. For those sources within the facility that have existing PTCs, the terms and conditions will be incorporated into the new permit. For sources at the facility for which a PTC was required but not obtained, the permit will establish new emission limits, controls, and other requirements in accordance with the applicable portions of IDAPA 58.01.01.200 through 223. The new facility-wide permit will address all applicable emission standards, required emission control technology, and demonstrate that the facility will not cause or contribute to any ambient air quality standard or applicable prevention of significant deterioration (PSD) increment.

The combined Tier II and PTC is different than, and separate from, the Tier I in that the new permit will establish new applicable emission limits, controls, and other requirements that are as stringent as the requirements contained in or enforceable under the state implementation plan. This permit

will create new underlying requirements for sources that are in existence at the time the initial Tier I is issued. A Tier I permit modification will, therefore, need to be issued concurrently with the issuance of the new facility-wide permit.

The applicable requirements established in the facility-wide permit pursuant to IDAPA 58.01.01.200 through 223 shall be clearly identified as such in the permit and shall remain in full force and effect until such time as they are modified or terminated in accordance with the procedures for issuing a PTC.

TABLE 10.1. SOURCES CONSTRUCTED AND/OR MODIFIED WITHOUT A PTC

back rip saw (Bldg. 3)	4-head moulder A jamb	porch post lathe
back rip saw (Bldg. 5)	4-head moulder B jamb	porch post sander
bulk even ending trim saw	4-head moulder #1	radial-arm saw
5/4 chipper system	4-head moulder #2	resaw #552/572
chop saw (Bldg. 6)	4-head moulder #379	resaw #553
chop saw D321/521	5-head moulder #376	rip saw #1
chop saw #1	8-head moulder #379	rip saw #2
chop saw #4, router and mini-sander	9-head moulder #378	sand blaster (Bldg. 1)
chop saw #541	in-line end trim machine #6	single resaw #351
chop saw #542	in-line end trim machine #8	specialty end trim machine
chop saw #543	in-line end trim machine N	tenenor #373
chop saw #561	in-line end trim machine S	tenenor #374
chop saw #571	in-line tenenor (Bldg. 3)	tenenor #375
chop saw #572	mezzanine chop saw #1	tenenor #378
chop saw #573	mezzanine chop saw #2	tenenor #379
chop saw #574	mezzanine sander	tenenor #381
chop saw #575	mini-hog (Bldg. 6)	tri-state rip saw #314
chop saw #576	moulder #373	twin resaw #352
chop saw #641	moulder #374	twin resaw #D353
chop saw #642	moulder #375	twin resaw #551
core moulder (Bldg. 3)	5/4 moulder #571	wood treat operation
core moulder #361	5/4 moulder #572	wrap machine #1
5/4 core moulder #561	5/4 moulder #573	wrap machine #2
cutline #1 (6 chop saws)	5/4 moulder #574	wrap machine #3
cutline #2 (7 chop saws)	5/4 moulder #575	wrap machine #4
cutline #3 (10 chopsaws)	5/4 moulder #576	wrap machine #5
fingerjointer #541	(2) off-line tenenors (Bldg. #3)	wrap machine #6
fingerjointer #542	5/4 open air shaker	wrap machine #7
fingerjointer #543	panel rip #1	wrap machine #8
6/4 fingerjointer #641	panel rip #2	wrap machine #9

6/4 fingerjointer #642	5/4 panel rip	wrap machine #10
hammer hog system	paper printer	wrap machine #11
		wrap machine #12

The specific compliance schedule elements and milestones to achieve compliance are described below.

Permit Condition 6.2. The permittee will be required to submit a complete permit application with all supporting information and documentation for issuance of a facility-wide permit in accordance with IDAPA 58.01.01.400 through 410 no later than 90 days from the final issuance date of the Tier I. A facility-wide permit is required by the Department to establish the terms and conditions necessary to comply with an applicable rule or standard. The Department shall consider the emissions from all sources at the facility and the specific requirements for individual sources in preparing the facility-wide operating permit.

The permit application shall clearly identify all emissions units at the facility - listing currently permitted emissions units, exempted units for which the facility maintains exemption documentation, units constructed before and not modified since January 24, 1969, and units constructed and/or modified since January 24, 1969 without a permit or construction approval from the Department. Application information shall provide facility information and emissions data for all emissions units in accordance with IDAPA 58.01.01.402 and 403 and shall include a demonstration that the sources at the facility will not cause or significantly contribute to a violation of the NAAQS or of any applicable PSD increment.

The application submittal deadlines have been set to reasonably accommodate updating and organizing the emissions unit descriptions and emissions data, and conducting ambient air quality modeling for all sources. Applications that are deemed or remain incomplete beyond the 90-day milestone shall constitute a violation of this permit condition.

Permit Condition 6.3. In addition to the information submitted under Permit Condition 6.2, the permittee is required to submit all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the NSPS requirements in 40 CFR 60, Subpart KB for the construction and/or modification of sources for which the permittee was required but did not obtain a PTC. The information must include all information to address the additional permit requirements for new major facilities or major modifications where construction without enforceable limits may have triggered PSD or nonattainment new source review (NSR) requirements.

This data must be submitted with the complete permit application required under Permit Condition 6.2 in order to issue a single combined permit. The information is, therefore, due no later than 90 days from the final issuance date of the Tier I. Failure to include complete information for addressing the PTC requirements within the required timeframe shall constitute a violation of this permit condition.

Permit Condition 6.4. If through the development of the facility-wide permit, any other source or sources are identified that should have obtained a PTC or PTC modification and for which the applicant did not include the information under Permit Condition 6.3, a supplemental application that contains all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 shall be submitted no later than 30 days after receiving written notification from the Department. Supplemental applications that are deemed or remain incomplete beyond the 30-day milestone shall constitute a violation of this permit condition.

Permit Condition 6.5. If the permittee can clearly demonstrate that the data required for the facility-wide permit cannot be collected and organized within the specified timeframe, the permit application submittal deadlines may be extended at the discretion of the Department for a specific time period not to exceed one year. For the Department to consider a request for an extension without jeopardizing the terms and conditions of the permit, the request must be submitted by the facility no later than the midpoint of the compliance milestone timeline. The request must be submitted in writing with a clear demonstration why the data cannot reasonably be submitted within the specified timeframe. An example of information that might justify an extension is the absence of ambient monitoring data required to complete a PSD application.

The Department will review the request and the justification and approve or disapprove the extension in writing. The responsibility for meeting the schedule if the Department has not issued a written extension belongs to the permittee.

Permit Condition 6.6. The Department intends to draft and issue a single facility-wide permit to bring the permittee back into compliance. This permit will fully meet all of the applicable requirements in the *Rules* and the federally approved state implementation plan. Because the permit will contain both elements of PTCs and of Tier II permits, it will clearly identify the origin and basis for each term and condition. The terms and conditions established pursuant to the PTC requirements shall be clearly marked and shall not expire with any Tier II operating permit term. The terms and conditions established pursuant to the Tier II requirements shall be clearly marked and shall be implemented in accordance with the Tier II process. The procedures for issuing a PTC in IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II in IDAPA 58.01.01.404. The permit shall clearly state that any future modification of a term or condition in the permit shall be subject to the appropriate procedural requirements on which the original term or condition was based.

Permit Condition 6.7. Within 30 days after the facility-wide permit application is determined complete by the Department, the permittee will need to request a significant permit modification to the Tier I in accordance with IDAPA 58.01.01.382.02. A significant Tier I modification will require the payment of fees in accordance with IDAPA 58.01.01.389.06.b.iii. Because the information in a complete application as required under Permit Condition 6.2 and 6.3 should contain all of the technical information necessary to modify the Tier I, the Department may waive portions of the standard application requirements as appropriate provided the permittee certifies the completeness, truth, and accuracy of all documents submitted.

The Tier I modification shall be processed concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I in IDAPA 58.01.01.360 through 369.

Permit Condition 6.8. The permittee shall be required to submit a progress report at the end of each calendar quarter (January 1, April 1, July 1, and October 1) of each year stating when each of the conditions of each milestone were or will be achieved. A detailed explanation is required when milestones were not or will not be achieved in accordance with the schedule.

Permit Condition 6.9. The incorporation of the compliance schedule into the Tier I operating permit does not sanction noncompliance with the applicable rules.

11. ACID RAIN PERMIT

Woodgrain Millwork is not subject to the acid rain permitting requirements of 40 CFR 72 through 75. The facility is not an affected unit according to the definitions and applicability under 72.2 and 72.6. The Woodgrain Millwork facility is a non-utility unit (72.6(b)(8)). "Unit" is defined as a fossil fuel-burning device and "utility" is defined as any person that sells electricity.

12. AIRS DATABASE

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	B	B					U
No _x	B	B					U
CO	B	B					U
PM ₁₀	B	B					U
PT (Particulate)	A	A				A	U
VOC	A	A				A	U
THAP (Total HAP)	A	A			A		U
			APPLICABLE SUBPART				
					KK		

AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant that is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

13. REGISTRATION FEES

Woodgrain Millwork is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees, in accordance with IDAPA 58.01.01.387, apply.

14. RECOMMENDATION

Based on the Tier I application and review of the federal regulations and state rules, staff recommend that DEQ issue final Tier I operating permit No. 075-00001 to Woodgrain Millwork, Inc. for their facility in Fruitland.

ABC\kk Project No. T1-9506-103-1

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APPENDIX A

Public Comments and DEQ Responses

October 1, 2002

**STATE OF IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PUBLIC COMMENTS
ON DRAFT AIR QUALITY TIER I OPERATING PERMIT
FOR WOODGRAIN MILLWORK – FRUITLAND, IDAHO**

Introduction

The Department of Environmental Quality (Department) provided the draft Tier I operating permit for the Woodgrain Millwork facility for public comment as required by IDAPA 58.01.01. 364, *Rules for the Control of Air Pollution in Idaho*. The public comment period was held from August 8 through September 12, 2002. A public hearing was scheduled concurrently with the public comment period. The public hearing was held September 11, 2002 in the Fruitland City Hall Council Chambers. Public comment packages, which included the application materials, and draft permit and technical memorandum, were made available for public review at the Fruitland Public Library; the Department's Boise Regional Office, and the Department's State Office in Boise. A copy of the draft permit and technical memorandum was also posted on the Department's Web site.

Written comments received were from Woodgrain Millwork only. Oral comments were given during the public hearing. Those comments regarding the air quality aspects of the permit are presented below with the Departments response immediately following.

Public Comments and the Departments Responses

The first five comments are oral comments received during the public hearing. The remaining comments are the written comments provided by Woodgrain Millwork.

Comment No. 1: Facility emits dust and has odors.

Response to Comment No. 1:

Fugitive Dust

Permit Condition 2.1 requires the facility take all reasonable precautions to prevent particulate matter (i.e. dust) from becoming airborne as required by accordance with IDAPA 58.01.01.650-651.

Compliance with Permit Condition 2.1 is reasonably assured by (1) requiring the permittee maintain records of the frequency and the methods used to control fugitive dust emissions (Permit Condition 2.2), (2) requiring the permittee maintain records of all fugitive dust complaints, and take corrective action in response to each relevant complaint (Permit Condition 2.3), and (3) conduct periodic facility-wide inspections of all potential source of fugitive dust to ensure the methods being used to reasonably control fugitive emissions are effective (Permit Condition 2.4).

Odors

Permit condition 2.5 requires: *"No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution."*

Compliance with Permit Condition 2.5 is reasonably assured by maintaining records of all odor complaints, and taking corrective action in response to each relevant odor complaint.

Comment No. 2:

Will the consolidating all of Woodgrain's permits into one permit make it easier for the facility to pollute the air?

Response to Comment No. 2:

On the contrary, the Tier I operating permit incorporates all air quality requirements that apply to a facility into a single document so compliance with these requirements is more easily determined by the public, the facility, and the regulatory agency, be it the Department or the EPA. For each applicable requirement in the permit, there are associated monitoring and recordkeeping requirements upon which compliance can be determined. Annual and semiannual inspections of these documents, as well as an onsite inspection of all sources or air emissions are the mechanisms used by regulatory agencies to determine compliance or noncompliance.

Comment No. 3:

How often are inspections of the air quality conducted at the facility?

Response to Comment No. 3:

The permittee is required to conduct a quarterly facility-wide inspection of potential sources of fugitive emissions and visible emissions. If emissions are not being reasonably controlled, the permittee must take corrective action within 24 hours or conduct more rigorous testing. For each inspection, the permittee is required to maintain records which must include, at a minimum, the date of the inspection, the permittee's assessment of the conditions existing at the time emissions were present (if observed), any corrective action taken in response to the emissions, and the date the corrective action was taken.

Comment No. 4:

Who is asking for the Permit?

Response to Comment No. 4:

Woodgrain Millwork is a major source of air pollution, and as such, is required by Title V of the Clean Air Act to obtain an operating permit. The Department implements Title V of the Clean Air Act through its Tier I operating permit program.

Comment No. 5:

What does the Permit do and what is it for?

Response to Comment No. 5:

The permit incorporates all air quality requirements that apply to the facility into a document so the public, the facility, and the regulatory agency more easily determine compliance with these requirements. For each applicable requirement, there are corresponding monitoring and recordkeeping requirements upon which compliance or noncompliance can be determined. Reports of all monitoring are reviewed semiannually and annually.

Comment No. 6:

In Section 1.3, Table 1.1, and Section 3, Table 3.1 of the Permit, add clarification to the Dimensional Lumber Process by adding "Optimizer" to the title (Dimensional Lumber Process –Optimizer).

Response to Comment No. 6:

The permit (and technical memorandum) has been changed in response to Comment No. 6.

Comment No. 7: Add a note after Table 1.1 stating that there are other emission sources at this facility that are not regulated because they have a "grandfathered status".

Response to Comment No. 7:

No emissions source has "grandfather status." Visible emissions requirements (IDAPA 58.01.01.625), for example, apply to all emissions sources regardless of date of construction. An emissions units date of construction or modification triggers which regulatory requirements apply. Just because there may be "old" emissions units at a facility does not mean those emissions units are not subject to any air quality regulations. Woodgrain Millwork is required to identify and describe all emissions of pollutants for which the facility is major and all emissions of regulated air pollutants from each emissions unit.

Comment No. 8: Add "M" to the baghouse name given in Section 3, Table 3.1.

Response to Comment No. 8:

The permit has been changed in response to Comment No. 8.

Comment No. 9: Please clarify why there are different permit limits for the same baghouse (Baghouse M) in Table 4.2, Sections 4.1 and 4.2, and Table 3.2, sections 3.1 and 3.2.

Response to Comment No. 9:

The permit limits indicated in Comment No. 9 were established by Permit to Construct No. 075-00001 on two different dates using information supplied by Woodgrain Millwork in their permit applications. On February 20, 1998, the Department issued PTC No. 075-00001 for the Wood shavings bagging operation that is controlled by Mac Environmental baghouse. The ensuing permit conditions are based on application materials. On May 28, 2002, the Department issued PTC No. 075-00001 for the Dimensional lumber – optimizer process that is controlled by baghouse M. Again, the ensuing permit conditions are based on application materials.

The underlying requirement for both processes is process weight particulate matter emissions limitations (IDAPA 58.01.01.702). This regulation presumes emissions are uncontrolled. Because a baghouse is used to control emissions, it is highly unlikely emissions will exceed process weight limitations assuming the baghouse is operated as designed. The Department recommends that Woodgrain Millwork address this discrepancy in the facility-wide permit application required by the compliance schedule.

Comment No. 10: Request clarification in section 4.6 that production limit is based on forty-five pound bales, which total 42 tons/day.

Response to Comment No. 10:

This requested clarification has been included in the technical memorandum. Permit Condition 4.6 is established by PTC No. 075-00001 dated May 28, 2002. The PTC would have to first be changed in order to reflect the change in the Tier I operating permit.

Comment No. 11: Process description in Section 5 of the Permit does not describe the process. Suggest the following replace the existing text:

"Process involves the application of various coating on molding, window, door, and millwork accessory assemblies. Solved based and waterborne coatings are applied by various methods such as flow coating, spray, and printers. The Prefinish operations also include a wrap process that applies laminates to molding, window, door, and millwork assemblies using different adhesives."

Response to Comment No. 11:

The permit has been changed in response to Comment No. 11.

Comment No. 12: Process #7 was tested in 1995 and it was determined that it would not work. Reference to this process can be deleted from the permit.

Response to Comment No. 12:

Process #7 has been deleted from the permit as requested.

Comment No. 13: In reference to Sections 5.4 through 5.4.11 and sections 5.11 through 5.25, comments submitted requesting review of applicability of 40 CFR 63, Subpart KK to facility.

Response to Comment No. 13:

A review of the printing operations has revealed that the press prints on a substrate that is applied to architectural mouldings, and that wood is not the substrate that passes through the rotogravure press. . Specifically, the press produces an intermediate product similar to a decorative laminate. Printing a design onto a paper product produces the "decorative laminate." In addition, another press at the facility prints on a plastic substrate, which under 40 CFR 63.822 is a "printed substrate not otherwise defined." The Department has determined that by these two materials, and not wood, should be referred to as the substrate for use in the interpretation of 40 CFR 63 Subpart KK. The Department does not dispute that Subpart KK does not specifically address the wood building products industry; however, the Department has based applicability to Subpart KK on process information that shows that printing operations revolve around the use of paper and plastic substrates.

A review of available information has revealed that two printing stations exist. The 5 Print-head machine was determined to be a rotogravure printing press with a feed station, a rotogravure print station, and a rewind, or collection station. Per 40 CFR 63.822, these stations are defined as the components of a rotogravure press. Based on available information, the Department has determined that this press engages in product and packaging printing; therefore, Subpart KK applies. The second "printing" operation has been determined to use plastic moldings as the substrate. From available information, the Department has determined that this operation is composed of multiple rotogravure presses, as defined by 40 CFR 63.822; therefore, Subpart KK applies.

The Department has determined that the Building 1 rotogravure press operated by the facility is, per 40 CFR 63.821(a)(2), a designated affected source. From information provided in the facility's Tier I operating permit application, total mass of inks, coatings, and other materials applied by the rotogravure press is greater than 5% of the total mass of inks, coating, and other materials applied by the press. The Department has only included the mass of materials applied to the paper substrate by the press, inboard and outboard work stations. The Department has not included the mass of materials applied to the wood substrate or to the paper substrate after the rotogravure press in its determination of applicability because these operations are separate, and different, processes.

The Department has also determined that the printing presses using a non-wood product substrate at the facility's base coating line are affected sources subject to subpart KK. The mass of inks, coating, and other materials applied by these presses, and the inboard and outboard stations, shall be used to determine if these presses are designated affected sources, as defined by per 40 CFR 63.821(a)(2). The Department has not made this determination because currently available facility data does not clearly define process layout, nor per equipment emissions or material usage, to the degree necessary to perform a designated affected source determination.

Comment No. 14: Permittee proposes to show compliance by demonstrating that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.20 kg of organic HAP per kg of solids applied, on an as purchased basis.

Response to Comment No. 14:

Permit Conditions 5.4.3 and 5.4.3.2 state the permittee must demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis. This language is cited from 40 CFR 63.825(b)(3)(i)(B), and does not contain the language "on an as purchased basis." The permit, therefore, has not been changed in response to Comment No. 14.

Comment No. 15: Request to change schedule for submittal of information required by general provision 21 from submission annually beginning 12 months from the permit issuance date, or more frequently, to calendar year basis.

Response to Comment No. 15:

Changes to General Provision 21 have not been made as requested. Permit Condition 2.16, however, has been changed in response to Comment No. 15. Permit Condition 2.16 has been changed so the facility can submit its reports on an annual basis, as long as the initial report is submitted within 12 months from the permit issuance date. Permit Condition 2.16 now reads as follows:

The initial periodic compliance certification required by General Provision 21 shall be submitted within 30 days of the end of 12 month period following issuance of the permit to the following:

*EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101*

Thereafter, all periodic compliance certifications required by General Provision 21 shall be submitted within 30 days of the end of each calendar year to the above address.

Comment No. 16: Request that semiannual monitoring reports required by General Provision 24 be submitted in July for the first six months and January for the final six months of a year.

Response to Comment No. 16:

Permit Condition 2.16 has been changed in response to Comment No. 16.

Comment No. 17: Request to use application update submitted June 24, 2002 to prepare the operating permit. This updated application corresponds with the facility's new site wide Tier II application submitted on the same date.

Response to Comment No. 17:

The Department will use the information contained in the June 24, 2002 submittal as supplemental application materials, but still requires the permittee comply with all requirements contained in the compliance schedule.

Comment No. 18: Change site contact name, phone, and mailing address to:

David Lindsey, Vice President
208-452-3801, ext. 565
P.O. Box 566
Fruitland, Idaho 83619-0566

Response to Comment No. 89:

The permit has been changed in response to Comment No. 18.

Comment No. 19: Facility has used various cyclone emission factors in recent years based on guidance from consultant and IDEQ representatives. Woodgrain has researched the accepted cyclone emission factors for businesses with millwork processes very similar to the Fruitland mill, and those processes also use .5 lb/BDT for low and medium efficiency cyclones.

Response to Comment No. 19:

The Departments Tier I operating permit requirements do not provide the Department the regulatory authority to change any underlying permit condition resulting from a PTC or any other SIP approved permit. The permittee would have to first change the PTC condition in question and then open the Tier I operating permit to incorporate the change.

Miscellaneous:

Numerous comments directed at facility personnel were received regarding plant operations and future air quality improvements at the facility. These comments are beyond the scope of Tier I operating permit requirements. The Department has not addressed any of these type comments.

An oral comment that was received expressed that the proximity of the facility to his home infringes on his rights to sell his home for the price he wants. This comment is beyond the scope of Tier I operating permit requirements. The Department has not addressed this comment.